

Appendix E – Longley Meadows Fish Enhancement Project – Response to Comments

Greater Hells Canyon Council (GHCC) Comments – Brian Kelly

GHCC1 – GHCC supports projects to benefit fish habitat, clean waters, hydrology, and resilient riparian systems.

We appreciate your adherence to the National Environmental Policy Act by preparing and Environmental Assessment.

We'd like to express our gratitude to all of the partners who are working to accomplish the restoration of the Grande Ronde River.

Response: *Thank you for your support of this project.*

GHCC2 – A project of this has the potential to create negative impacts during its implementation. We encourage you to take every possible measure to avoid for minimize these impacts. We are confident you will utilize all available best management practices and follow all legal requirements for this type of work. Also, we encourage you to apply any “lessons learned” from the first phase of the restoration work on this stretch of the Grande Ronde River.

Response: *Refer to pages 16-36 of the EA for all Management Requirements, Constraints, Design Criteria, Mitigation Measures, and best management practices to be applied to the implementation of this project.*

Lessons learned and monitoring results from the implementation of Bird Track Springs Fish Habitat Enhancement Project were used during project design for Longley Meadows and in the analysis of the effects of implementation (EA pages 37-150). See also the Longley Meadows 80% Basis of Design Report in the project analysis file.

GHCC3 – We strongly encourage and support the use of native plant species for all of the vegetation planting and seeding for this project.

Response: *As described on pages 11-13, 20, and 22-23 of the EA native species will be used for all vegetation planting and seeding for this project. Wherever possible, plants salvaged from the site will be retained and re-planted within the project area.*

Charles Pace (CP) Comments

CP1 – Restoring habitat in the Grand Rhonde is a noble thing to do. However, this is not the responsibility of the hydro system. Rather, the harmful effects on spawning and rearing of anadromous fish come from logging, railroad construction and mining. For BPA to use ratepayers' funds for this project violates the “in lieu” provisions in the Northwest Power Act. BPA needs to focus on the mainstem and tributaries that are impacted by the day-to-day (and hour-to-hour) operation for wind integration, power peaking, load following, etc. These are the factors with harm directly tied to power system operations, not over logged and mined out tributaries in the upper reaches of the basin. Instead, BPA has become a “sugar daddy” for funding projects that bear no resemblance to the projects envisioned in the Northwest Power Act.

Response: *Thank you for your comment. One of the purposes of the Northwest Power Act is to “protect, mitigate, and enhance fish and wildlife, including related spawning grounds and habitat, of the Columbia River and its tributaries,” 16 U.S.C. § 839(6), and the Act explicitly recognizes enhancement measures “as a means of achieving offsite protection and enhancement” for fish and wildlife affected by development and operation of the Federal Columbia River Power System. 16 U.S.C. § 839b(h)(8)(A). As in this instance, Bonneville often implements offsite enhancement measures to address its responsibilities under the Endangered Species Act.*

The “in lieu” provision of the Northwest Power Act; however, is a separate issue. The provision states that Bonneville’s fish and wildlife expenditures “shall be in addition to, not in lieu of, other expenditures authorized or required from other entities under other agreements or provisions of law.” Bonneville is not aware of any other entity being legally authorized or required to provide funding for the portion of the Longley Meadows Restoration Project that Bonneville proposes to fund, and this comment provides no evidence contradicting that conclusion. In fact, the Longley Meadows Restoration Project exhibits reasonable cost sharing with other agencies which demonstrates that Bonneville’s funding is not supplanting that of another entity already authorized or required to undertake the activity.